

The Honorable Ricardo S. Martinez

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

WASHINGTON STATE ASSOCIATION OF
HEAD START AND EARLY CHILDHOOD
ASSISTANCE AND EDUCATION PROGRAM,
ILLINOIS HEAD START ASSOCIATION,
PENNSYLVANIA HEAD START
ASSOCIATION, WISCONSIN HEAD START
ASSOCIATION, FAMILY FORWARD
OREGON, and PARENT VOICES OAKLAND,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of Health and Human
Services; U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES; ANDREW
GRADISON, in his official capacity as Acting
Assistant Secretary of the Administration for
Children and Families; ADMINISTRATION
FOR CHILDREN AND FAMILIES; OFFICE OF
HEAD START; and TALA HOOBAN, in her
official capacity as Acting Director of the Office
of Head Start,

Defendants.

Case No. 2:25-cv-00781-RSM

**DECLARATION OF JENNESSA
CALVO-FRIEDMAN IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A
PRELIMINARY INJUNCTION
RE: IMMIGRANT
EXCLUSION DIRECTIVE**

NOTE ON MOTION CALENDAR:
Sept. 5, 2025

1 I, Jenessa Calvo-Friedman, hereby declare and state as follows:

2 1. I am over the age of eighteen and competent to make this declaration. I am a Senior
3 Staff Attorney at the ACLU Women's Rights Project and one of the attorneys representing
4 Plaintiffs in the above-captioned matter. I am a member in good standing of the bar of the State
5 of New York and I am admitted to appear pro hac vice in the United States District Court for the
6 Western District of Washington, pursuant to this Court's Text Order on May 8, 2025.

7 2. I submit this Declaration and its attached Exhibits in support of Plaintiffs' Motion
8 for a Preliminary Injunction regarding the Immigrant Exclusion Directive, pursuant to Federal
9 Rule of Civil Procedure 65. I make the following statements on the basis of my own knowledge
10 or a review of files in my possession, and if called as a witness, I could and would competently
11 testify thereto.

12 3. Attached as **Exhibit 1** is a true and correct copy of the declaration of Andrew
13 Gradison submitted in opposition to Plaintiffs' Motion for a Preliminary Injunction in *New York*
14 *v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. Aug. 11, 2025), ECF No. 48-1.

15 4. Attached as **Exhibit 2** is a true and correct copy of the press release "HHS Bans
16 Illegal Aliens from Accessing its Taxpayer-Funded Programs" from the HHS website, which
17 when last visited on August 29, 2025, included a text box stating "HHS has agreed to stay
18 enforcement and application through September 10, 2025." It can be found at
19 [https://www.hhs.gov/press-room/prwora-hhs-bans-illegal-aliens-accessing-taxpayer-funded-](https://www.hhs.gov/press-room/prwora-hhs-bans-illegal-aliens-accessing-taxpayer-funded-programs)
20 [programs.](https://www.hhs.gov/press-room/prwora-hhs-bans-illegal-aliens-accessing-taxpayer-funded-programs)

21 5. Attached as **Exhibit 3** is a true and correct copy of the declaration of Dr. Maria
22 Guadalupe Jaime-Mileham, Deputy Director of the California Department of Social Services,
23 Child Care and Development Division, submitted in support of Plaintiffs' Motion for a
24 Preliminary Injunction in *New York v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. July 21, 2025),
25 ECF No. ECF 4-15.

26 6. Attached as **Exhibit 4** is a true and correct copy of the declaration of Tony
27 Thurmond, Superintendent of Public Instruction for the State of California, submitted in support

1 of Plaintiffs' Motion for a Preliminary Injunction in *New York v. U.S. Dep't of Justice*, No. 25-
2 cv-345 (D.R.I. July 21, 2025), ECF No. 4-16.

3 7. Attached as **Exhibit 5** is a true and correct copy of the declaration of Rosario M.
4 Wortman, Director of Illinois Migrant and Seasonal Head Start at the Illinois Department of
5 Human Services, submitted in support of Plaintiffs' Motion for a Preliminary Injunction in *New*
6 *York v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. July 21, 2025), ECF No. 4-28.

7 8. Attached as **Exhibit 6** is a true and correct copy of the declaration of Stacie
8 McCoy, Head Start Collaboration Director for the Maine Department of Public Education,
9 submitted in support of Plaintiffs' Motion for a Preliminary Injunction in *New York v. U.S. Dep't*
10 *of Justice*, No. 25-cv-345 (D.R.I. July 21, 2025), ECF No. 4-38.

11 9. Attached as **Exhibit 7** is a true and correct copy of the declaration of Casey
12 Lafferty, Deputy Director of Policy Research, and Quality Initiatives Division at the New Mexico
13 Early Childhood Education and Care Department, submitted in support of Plaintiffs' Motion for
14 a Preliminary Injunction in *New York v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. July 21,
15 2025), ECF No. 4-47.

16 10. Attached as **Exhibit 8** is a true and correct copy of the declaration of Elana
17 Marton, Deputy Director and Counsel for the New York State Council of Children and Families,
18 submitted in support of Plaintiffs' Motion for a Preliminary Injunction in *New York v. U.S. Dep't*
19 *of Justice*, No. 25-cv-345 (D.R.I. July 21, 2025), ECF No. 4-53.

20 11. Attached as **Exhibit 9** is a true and correct copy of the declaration of Alyssa
21 Chatterjee, Early Learning System Director for the Oregon Department of Early Learning and
22 Care, submitted in support of Plaintiffs' Motion for a Preliminary Injunction in *New York v. U.S.*
23 *Dep't of Justice*, No. 25-cv-345 (D.R.I. July 21, 2025), ECF No. 4-58.

24 12. Attached as **Exhibit 10** is a true and correct copy of the declaration of Cynthia
25 Marten, Delaware Secretary of Education, submitted in support of Plaintiffs' Motion for a
26 Preliminary Injunction in *New York v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. Aug. 18,
27 2025), ECF No. ECF 55-1.

1 13. Attached as **Exhibit 11** is a true and correct copy of the declaration of Katrina T.
2 McCombs, Director of Illinois Migrant and Seasonal Head Start at the Illinois Department of
3 Human Services, submitted in support of Plaintiffs' Motion for a Preliminary Injunction in *New*
4 *York v. U.S. Dep't of Justice*, No. 25-cv-345 (D.R.I. Aug. 18, 2025), ECF No. 55-3.

5 I declare under penalty of perjury that the foregoing is true and correct.

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7 Dated: August 29, 2025

/s/ Jenessa Calvo-Friedman

8 Jenessa Calvo-Friedman
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